

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

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STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Plaintiff,

v.

UNIVERSAL HEALTH GROUP, INC.
A/K/A MICHIGAN SPINE AND REHAB,
UHG MANAGEMENT, LLC,
PROFESSIONAL HEALTH SYSTEMS,
LLC A/K/A PROFESSIONAL MEDICAL
BILLING, LLC, SCOTT P. ZACK, D.C.,
DAVID M. KATZ, D.C.,
LOREN C. CHUDLER, D.O.,
JOSEPH F. DESANTO, HORIZON
IMAGING, LLC, CLEAR IMAGING, LLC,
JEFF S. PIERCE, D.O.,
THOMAS D. CARUSO, D.O., and
KATHERINE H. KARO, D.O.,

Case No. 14-cv-10266

Hon. Stephen J. Murphy, III

Magistrate Judge
David R. Grand

Defendants.

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**STIPULATION FOR EXTENSION OF DEADLINES
FOR STATE FARM'S RESPONSES TO MOTIONS TO DISMISS
AND RELATED JOINDERS**

This matter is brought before the Court upon the Stipulation of the undersigned parties and the Court is otherwise duly informed in the premises:

THE UNDERSIGNED PARTIES ACKNOWLEDGE that (a) Plaintiff State Farm Mutual Automobile Insurance Company ("State Farm") has filed a Complaint containing 285 paragraphs and attaching 21 Exhibits; (b) multiple

defendants have filed motions to dismiss State Farm's Complaint, including (i) Defendants Scott P. Zack, D.C. and Defendant David M. Katz, D.C. (*see Dkt. No. 45*); (ii) Defendant Loren C. Chudler, D.O. (*see Dkt. No. 46*); and (iii) Defendants Universal Health Group, UHG Management, and Professional Medical Billing, LLC (*see Dkt. No. 49*); (c) other defendants have filed "joinders" in some or all of the foregoing motions to dismiss, including (i) Defendants Horizon Imaging, LLC and Clear Imaging, LLC (*see Dkt. No. 47*) and (ii) Defendants Jeff S. Pierce, D.O. and Thomas D. Caruso, D.O. (*see Dkt. No. 52*). The parties acknowledge the foregoing filings collectively exceed 100 pages and touch upon numerous legal issues. The parties also acknowledge that, pursuant to Local Rule 7.1(e)(1)(B), State Farm must respond to the earliest-filed motions and joinders – Dkt. Nos. 45, 46, and 47 – by Thursday, May 1, 2014 and State Farm's responses to the remaining filings are due shortly thereafter. The parties further acknowledge that, given the length of the motions to dismiss and joinders, an extension of approximately two weeks is needed for State Farm to respond to those filings.

THEREFORE IT IS HEREBY STIPULATED AND AGREED that State Farm may respond to the aforementioned motions to dismiss and joinders – Dkt. Nos. 45-47, 49, and 52 – by Friday, May 16, 2014.

AGREED AND CONSENTED TO BY:

MILLER CANFIELD PADDOCK & STONE PLC

By: /s/ Thomas W. Cranmer

Thomas W. Cranmer (P25252)

Attorney for Plaintiff State Farm Mutual Automobile Insurance Company

Dated: April 24, 2014

KATTEN MUCHIN ROSENMAN LLP

By: /s/ Jared T. Heck

Jared T. Heck (IL 6289711)

Attorney for Plaintiff State Farm Mutual Automobile Insurance Company

Dated: April 24, 2014

BUTZEL LONG, a professional corporation

By: /s/ Michael J. Lavoie

Michael J. Lavoie (P32584)

Attorney for Defendants Scott P. Zack, D.C. and David M. Katz, D.C

Dated: April 24, 2014

JOELSON ROSENBERG PLC

By: /s/ Peter W. Joelson

Peter W. Joelson (P51468)

Attorney for Defendants Jeff S. Pierce, D.O. and Thomas D. Caruso, D.O.

Dated: April 24, 2014

LAW OFFICES OF BEN GONEK

By: /s/ Ben M. Gonek

Ben M. Gonek (P43716)

Attorneys for Defendants Universal Health Group; UHG Management; and Professional Medical Billing, LLC

Dated: April 24, 2014

KOTZ SANGSTER WYSOCKI PC

By: /s/ Jovan Dragovic

Attorney for Defendant Loren Chudler, D.O.

Dated: April 24, 2014

STARK REAGAN PC

By: /s/ Peter Arvant

Attorneys for Defendants Horizon Imaging, LLC and Clear Imaging, LLC

Dated: April 24, 2014

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THOMAS D. CARUSO, D.O., and
KATHERINE H. KARO, D.O.,

Hon. Stephen J. Murphy, III

Magistrate Judge
David R. Grand

Defendants.

-----X
**ORDER EXTENDING DEADLINES FOR STATE FARM'S RESPONSES
TO MOTIONS TO DISMISS AND RELATED JOINDERS**

This matter is brought before the Court upon the Stipulation of the relevant parties and the Court is otherwise duly informed in the premises:

IT IS HEREBY ORDERED that State Farm's deadline to respond to the following motions to dismiss and joinders is extended to Friday, May 16, 2014:

1. The Motion to Dismiss filed by Defendants Scott P. Zack, D.C. and Defendant David M. Katz, D.C. (Dkt. No. 45)

2. The Motion to Dismiss filed by Defendant Loren C. Chudler, D.O. (Dkt. No. 46)
3. The Joinder filed by Defendants Horizon Imaging, LLC and Clear Imaging, LLC (Dkt. No. 47)
4. The Motion to Dismiss filed by Defendants Universal Health Group, UHG Management, and Professional Medical Billing, LLC (Dkt. No. 49)
5. The Joinder filed by Defendants Jeff S. Pierce, D.O. and Thomas D. Caruso, D.O. (Dkt. No. 52)

SO ORDERED.

S/Stephen J. Murphy, III
Stephen J. Murphy, III
United States District Judge

Dated: April 30, 2014

I hereby certify that a copy of the foregoing document was served upon the parties and/or counsel of record on April 30, 2014, by electronic and/or ordinary mail.

S/Carol Cohron
Case Manager